

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

Index No.: _____/19

-----X
ANONYMOUS MAN,Plaintiff designates
KINGS COUNTY
as place of trial.*Plaintiff,*

-against -

The basis of venue is
Plaintiffs residence in Kings
CountyFREEDOM VILLAGE USA, FLETCHER
BROTHERS, DOE HARRIS and JOHN DOE,SUMMONS*Defendants.*
-----X

To the above-named defendants:

YOU ARE HEREBY SUMMONED to answer the complaint in this action and to serve a copy of your answer or, if the complaint is not served with this summons, to serve a notice of appearance, on the Plaintiff's Attorneys within 20 days after the service of this summons, exclusive of the day of service (or within 30 days after the service is complete if this summons is not personally delivered to you within the State of New York); and in case your failure to appear or answer, judgement will be taken for the relief demanded herein.

A COPY OF THIS SUMMONS WAS FILED WITH THE CLERK OF THE COURT, KINGS COUNTY ON _____ IN COMPLIANCE WITH CPLR §§305(a) AND 306(a).

Dated: New York, New York
September 4, 2019

MERSON LAW, PLLC

By: Jordan K. Merson
Attorneys for Plaintiff
150 East 58th Street 34th Floor
New York, New York 10155
(212) 603-9100

TO:
FREEDOM VILLAGE USA
5275 ny-14
Lakemont, NY 14857

FLETCHER BROTHERS
572 Rock Stream Road
Rock Stream, NY 14878

DOE HARRIS

JOHN DOE

**SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS**

Index No.: _____/19

-----X
ANONYMOUS MAN,

Plaintiff,

-against -

**VERIFIED
COMPLAINT**

**FREEDOM VILLAGE USA, FLETCHER BROTHERS,
DOE HARRIS, and JOHN DOE,**

Defendants.

-----X
Plaintiff¹ above named, complaining of the defendants, by **MERSON LAW,
PLLC.**, respectfully allege(s):

NATURE OF THE CLAIM

1. This is a case of plaintiff Anonymous Man who was sexually abused as a child by Pastor Doe Harris ("Pastor Harris") and John Doe ("Doe"), at and of Freedom Village USA ("Freedom Village") and/or Pastor Fletcher Brothers ("Brothers").
2. Pastor Harris was an agent, servant and/or employee of Freedom Village USA which operated under the exclusive control of Brothers. Pastor Harris was known among the community and the children as a sexual predator.
3. Doe was an agent, servant and/or employee of Freedom Village USA which operated under the exclusive control of Brothers. Doe was known among the community and the children as a sexual predator.
4. Despite Brothers and/or Freedom Village's knowledge that Pastor Harris sexually abused children and/or had the propensity to sexually abuse children, Brothers and/or Freedom Village USA allowed Pastor Harris unfettered access to children.

¹ Plaintiff uses a pseudonym because he is a victim of a sex crime pursuant to N.Y. Civ. Rights § 50-b and other statutory and common law principles.

5. Despite the Brothers and/or Freedom Village USA's knowledge that Doe sexually abused children and/or had the propensity to sexually abuse children, the Brothers and/or Freedom Village allowed Doe unfettered access to children.
6. Beginning in or about 1980 and continuing until approximately 1981, Pastor Harris and Doe, while under the scope of employment with the Freedom Village and/or Brothers and while acting on behalf of the Freedom Village and/or Brothers, would sexually abuse Plaintiff, then between fourteen and fifteen years old, by forcefully touching his penis, forcing him to engage in oral sex, raping him and other sexual abuse.
7. Plaintiff brings this lawsuit to recover for the emotional and physical suffering he endured because of the negligence of the Freedom Village USA and/or Fletcher Brothers and to make sure no other child is forced to suffer the abuse and physical and mental trauma he felt and continues to feel.
8. Plaintiff brings this lawsuit to recover for the emotional and physical suffering he endured because of the malicious, wanton, willful and/or intentional conduct of defendants Harris Doe and John Doe and to make sure no other child is forced to suffer the abuse and physical and mental trauma he felt and continues to feel.

PARTIES

9. At all times herein mentioned defendant **FREEDOM VILLAGE USA** was a corporation incorporated in the state of New York and by virtue of the laws of the State of New York.
10. At all times herein mentioned, defendant **FREEDOM VILLAGE USA** was located at 5275 NY-14, Lakemont, NY 14857.
11. At all times herein mentioned, defendant **FLETCHER BROTHERS** owned, operated and controlled defendant **FREEDOM VILLAGE USA**.

12. At all times herein mentioned defendant **FREEDOM VILLAGE USA** and its agents, servants and/or employees were under the exclusive control of defendant **FLETCHER BROTHERS**.
13. At all times herein mentioned defendants **FREEDOM VILLAGE USA** and **FLETCHER BROTHERS** were agents, servants, employees and/or alter egos of each other.
14. At all times herein mentioned, defendant **DOE HARRIS** was an agent, servant and/or employee operating under the direction and control of defendant **FREEDOM VILLAGE USA** and/or defendant **FLETCHER BROTHERS**, and its agents, servants and/or employees.
15. At all times herein mentioned, defendant **JOHN DOE** was an agent, servant and/or employee operating under the exclusive direction and control of defendant **FREEDOM VILLAGE USA** and/or defendant **FLETCHER BROTHERS**, and its agents, servants and/or employees.

FACTS OF THE CASE

16. Defendants **FREEDOM VILLAGE USA** and **FLETCHER BROTHERS**' negligence and recklessness caused defendant **DOE HARRIS** and defendant **JOHN DOE** to have access to children, including on Freedom Village and/or Brothers' personal property, despite their knowledge that defendants **DOE HARRIS** and **JOHN DOE** sexually abused children and/or had the propensity to sexually abuse children and therefore are responsible for the injuries that Plaintiff incurred because but for Defendants **FREEDOM VILLAGE USA** and/or **FLETCHER BROTHERS**' negligence, Plaintiff would not have suffered the mental and physical anguish inflicted by defendants **DOE**

HARRIS and **JOHN DOE**. Defendants' gross negligence, reckless, wanton, and/or willful conduct supports punitive liability.

17. Freedom Village's website promises parents that their children "will be valued and respected by our staff, treated with the same care and understanding that we would want our own children treated with."² Instead, the children at Freedom Village were physically, verbally and sexually abused by both staff members and other children.
18. Brothers personally hired Pastor Harris to run Freedom Village's day to day operations which included being responsible for the care and supervision of all of the children and staff members at Freedom Village.
19. Pastor Harris and Doe sexually assaulted Plaintiff and many other children of Freedom Village USA. Nonetheless, defendants **FREEDOM VILLAGE USA** and/or **FLETCHER BROTHERS** failed to remove Pastor Harris and Doe from their positions or to take any steps to keep the dangerous predators away from children. In fact, the Freedom Village and Brothers continued to allow, encourage and/or permit Pastor Harris and Doe to have unfettered access to children.
20. In approximately 1980 and continuing through approximately 1981, Pastor Harris and Doe, both together and separately, would repeatedly sexually abuse Plaintiff by forcing him to engage in oral sex, touching his penis and raping him.
21. The first occasion, Plaintiff returned to Freedom Village after some time away. Pastor Harris and Doe strip searched Plaintiff during the night, took him out of his dorm and sexually abused him.

² <https://www.freedomvillageusa.com/about-freedom-village> accessed August 9, 2019

22. Plaintiff was given his own bedroom at Freedom Village which gave Pastor Harris and Doe easy access to enter Plaintiff's room at night when he was sleeping to sexually abuse him.
23. Plaintiff was raped and/or otherwise sexually abused by Pastor Harris approximately 10 times.
24. Plaintiff was raped and/or otherwise sexually abused by Doe approximately 10 times.
25. At all times herein mentioned, Freedom Village USA was a Christian residential home for at risk youth. Many of the children at Freedom Village were either victims or perpetrators of sexual abuse.
26. Brothers, Pastor Harris and the other staff members were aware of the backgrounds of the troubled youth at its facilities. In fact, they often forced the children to share their stories with reporters and visitors in order to exploit their trauma for money.
27. Plaintiff and many other children were further sexually abused by other students at Freedom Village which, upon information and belief, Pastor Harris, Brothers and other staff members were aware.
28. Despite Brothers, Pastor Harris, Freedom Village and/or their agents, servants and/or employees knowledge that some of these children sexually abused other children and/or had the propensity to sexually abuse other children, they forced children of all ages and sizes to shower naked in the same room and allowed, encouraged and/or permitted children to sexually abuse other children in the shower room. Plaintiff and other children of Freedom Village were sexually abused in the shower room which included, fondling of the buttocks and penis, masturbation, digital penetration and other sexual abuse. Staff members and children of Freedom Village participated in making fun of the children's naked bodies including their weight and penis size.

29. Pastor Harris used his position of power and authority provided to him by Brothers and/or Freedom Village to provide himself with easy access to children including plaintiff and to manipulate plaintiff into not disclosing the abuse.
30. Doe used his position of power and authority provided to him by Brothers and/or Freedom village to manipulate plaintiff into not disclosing the abuse.
31. As such, Plaintiff suffered catastrophic and lifelong injuries as a result of defendant **FREEDOM VILLAGE USA** and **FLETCHER BROTHERS'** negligence in undertaking a duty, including but not limited to in locis parentis, in failing to protect the children of its residential facility and of its community safe from defendant **PASTOR HARRIS** and defendant **JOHN DOE** despite the **FREEDOM VILLAGE USA** and/or **FLETCHER BROTHERS** having knowledge Pastor Harris and John Doe abused and/or sexually abused children and/or had the propensity to abuse and/or sexually abuse children, and/or allowing Pastor Harris and Doe to continue to have their positions of authority and power with unfettered access to children, and Freedom Village and Brothers failed to adequately supervise Pastor Harris and Doe.

AS AND FOR A FIRST CAUSE OF ACTION FOR NEGLIGENCE

AS FOR FREEDOM VILLAGE USA

32. Plaintiffs repeat, reiterate and reallege each and every allegation contained in those paragraphs of this Complaint marked and designated 1. through 31., inclusive, with the same force and effect as if hereinafter set forth at length.
33. At all times mentioned herein, defendant **FREEDOM VILLAGE USA** owed a duty of care, including but not limited to in locis parentis, to keep the children of its residential facility safe, including plaintiff, from the abuse and/or sexual abuse by its agents, servants and or employees and other children under its supervision and control,

including on company premises, that ultimately befell the plaintiff, and they had a duty to supervise the children of the facility, Pastor Harris and Doe.

34. At all times mentioned herein, defendant **FREEDOM VILLAGE USA** and/or its agents, servants and/or employees breached the above-stated duty in a negligent, reckless, willful and wanton manner, and caused Plaintiff to be sexually assaulted.
35. As a result of the negligence of defendant **FREEDOM VILLAGE USA** and/or its agents, servants and/or employees, plaintiff was caused serious personal injuries, emotional distress, mental pain and suffering, mental anguish and/or physical manifestations thereof, and other losses, all of which have not as of yet been ascertained.
36. By reason of the foregoing, Plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just and adequate.
37. By reason of the foregoing, Plaintiff is entitled to punitive damages from defendants in such sums as a jury would find fair, just and adequate.
38. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.
39. This action falls within exceptions to Article 16 of the C.P.L.R.

AS AND FOR A SECOND CAUSE OF ACTION FOR NEGLIGENCE

AS FOR THE FLETCHER BROTHERS

40. Plaintiffs repeat, reiterate and reallege each and every allegation contained in those paragraphs of this Complaint marked and designated 1. through 39., inclusive, with the same force and effect as if hereinafter set forth at length.
41. At all times mentioned herein, defendant **FLETCHER BROTHERS** owed a duty of care, including but not limited to in locis parentis, to keep the children of its residential

facility safe, including plaintiff, from the abuse and/or sexual abuse by its agents, servants and or employees under its supervision and control, including on company and personal premises, that ultimately befell the plaintiff, and they had a duty to supervise Pastor Harris, Doe and the children of the facility.

42. At all times mentioned herein, defendant **FLETCHER BROTHERS** and/or his agents, servants and/or employees breached the above-stated duty in a negligent, reckless, willful and wanton manner, and caused Plaintiff to be sexually assaulted.
43. As a result of the negligence of defendant **FLETCHER BROTHERS** and/or its agents, servants and/or employees, plaintiff was caused serious personal injuries, emotional distress, mental pain and suffering, mental anguish and/or physical manifestations thereof, and other losses, all of which have not as of yet been ascertained.
44. By reason of the foregoing, Plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just and adequate.
45. By reason of the foregoing, Plaintiff is entitled to punitive damages from defendants in such sums as a jury would find fair, just and adequate.
46. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.
47. This action falls within exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A THIRD CAUSE OF ACTION FOR NEGLIGENT HIRING,
RETENTION AND SUPERVISION AS FOR FREEDOM VILLAGE USA**

48. Plaintiff repeats, reiterates and realleges each and every allegation contained in those paragraphs of this Complaint marked and designated 1. through 47., inclusive, with the same force and effect as if hereinafter set forth at length.

49. Defendant **FREEDOM VILLAGE USA**, had a duty to supervise and prevent known risks of harm to the children of its residential facility by its agents, servants and/or employees.
50. Defendant was negligent in hiring, retaining and supervising their personnel, such as Pastor Harris and Doe, who were careless, unskillful, negligent, reckless and acted in a willful and wanton manner in not possessing the requisite knowledge and skill of residential facility officials and residential facility supervisors who should have properly been supervising the agents, servants and/or employees and church officials to ensure the safety of the children of its residential facility.
51. Defendant **FREEDOM VILLAGE USA** knew or should have known Pastor Harris and Doe sexually abused and/or had the propensity to sexually abuse children and did nothing to stop it.
52. As a result of such negligent hiring, supervising and retention, Plaintiff was caused to suffer serious personal injuries, emotional distress, conscious pain and suffering, mental anguish and/or physical manifestations thereof, and other losses, all of which have not as of yet been ascertained.
53. By reason of the foregoing, Plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just and adequate.
54. By reason of the foregoing, Plaintiff is entitled to punitive damages from defendants in such sums as a jury would find fair, just and adequate.
55. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.
56. This action falls within exceptions to Article 16 of the C.P.L.R.

AS AND FOR A FOURTH CAUSE OF ACTION FOR NEGLIGENT HIRING,

RETENTION AND SUPERVISION AS TO FLETCHER BROTHERS

57. Plaintiff repeats, reiterates and realleges each and every allegation contained in those paragraphs of this Complaint marked and designated 1. through 56., inclusive, with the same force and effect as if hereinafter set forth at length.
58. Defendant **FLETCHER BROTHERS**, had a duty to supervise and prevent known risks of harm to the children of its residential facility by his agents, servants and/or employees.
59. Defendant was negligent in hiring, retaining and supervising their personnel, such as Pastor Harris and Doe, who were careless, unskillful, negligent, reckless and acted in a willful and wanton manner in not possessing the requisite knowledge and skill of residential facility officials and other residential facility supervisors who should have properly been supervising the agents, servants and/or employees and church officials to ensure the safety of the children of its residential facility.
60. Defendant **FLETCHER BROTHERS** knew or should have known Pastor Harris and Doe sexually abused and/or had the propensity to sexually abuse children and did nothing to stop it.
61. As a result of such negligent hiring, supervising and retention, Plaintiff was caused to suffer serious personal injuries, emotional distress, conscious pain and suffering, mental anguish and/or physical manifestations thereof, and other losses, all of which have not as of yet been ascertained.
62. By reason of the foregoing, Plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just and adequate.

63. By reason of the foregoing, Plaintiff is entitled to punitive damages from defendants in such sums as a jury would find fair, just and adequate.
64. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.
65. This action falls within exceptions to Article 16 of the C.P.L.R.

AS AND FOR THE FIFTH CAUSE OF ACTION FOR NEGLIGENT INFLECTION
OF EMOTIONAL DISTRESS AS TO FREEDOM VILLAGE USA

66. Plaintiff repeats, reiterates and realleges each and every allegation contained in those paragraphs of this Complaint marked and designated 1. through 63., inclusive, with the same force and effect as if herein set forth at length.
67. Defendant **FREEDOM VILLAGE USA** and its agents, servants and/or employees, knew or reasonably should have known that the failure to properly advise, supervise and hire Pastor Harris, Doe, and children of the facility, the agents, servants and/or employees who sexually abused Plaintiff, would and did proximately result in physical and emotional distress to Plaintiff.
68. Defendant **FREEDOM VILLAGE USA** and its agents, servants and/or employees knew or reasonably should have known that the sexual abuse and other improper conduct would and did proximately result in physical and emotional distress to Plaintiff.
69. Defendant has the power, ability, authority and duty to intervene with and/or stop the improper conduct that resulted in Plaintiff being sexually abused by the children of the facility, Pastor Harris and Doe.
70. Despite said knowledge, power and duty, defendant negligently failed to act so as to stop, prevent, and prohibit the improper conduct that resulted in Pastor Harris, Doe and the children of the facility abusing and/or sexually abusing Plaintiff.

71. By reason of the foregoing, Plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just and adequate.
72. By reason of the foregoing, Plaintiff is entitled to punitive damages from defendants in such sums as a jury would find fair, just and adequate.
73. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.
74. This action falls within exceptions to Article 16 of the C.P.L.R.

AS AND FOR THE SIXTH CAUSE OF ACTION FOR NEGLIGENT INFLICTION
OF EMOTIONAL DISTRESS AS TO FLETCHER BROTHERS

75. Plaintiff repeats, reiterates and realleges each and every allegation contained in those paragraphs of this Complaint marked and designated 1. through 74., inclusive, with the same force and effect as if herein set forth at length.
76. Defendant **FLETCHER BROTHERS** and its agents, servants and/or employees, knew or reasonably should have known that the failure to properly advise, supervise and hire Pastor Harris, Doe and children of the facility, the agents, servants and/or employees who sexually abused Plaintiff, would and did proximately result in physical and emotional distress to Plaintiff.
77. Defendant **FLETCHER BROTHERS** and its agents, servants and/or employees knew or reasonably should have known that the sexual abuse and other improper conduct would and did proximately result in physical and emotional distress to Plaintiff.
78. Defendant has the power, ability, authority and duty to intervene with and/or stop the improper conduct that resulted in Plaintiff being sexually abused by Pastor Harris, Doe and the children of the facility.

79. Despite said knowledge, power and duty, defendant negligently failed to act so as to stop, prevent, and prohibit the improper conduct that resulted in Pastor Harris, Doe and/or children of the facility abusing and/or sexually abusing Plaintiff.
80. By reason of the foregoing, Plaintiff is entitled to compensatory damages from defendants in such sums as a jury would find fair, just and adequate.
81. By reason of the foregoing, Plaintiff is entitled to punitive damages from defendants in such sums as a jury would find fair, just and adequate.
82. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.
83. This action falls within exceptions to Article 16 of the C.P.L.R.

**AS FOR A SEVENTH CAUSE OF ACTION FOR INTENTIONAL
INFLICTION OF EMOTIONAL DISTRESS AS TO DOE HARRIS**

84. Plaintiff repeats reiterates, and reallages each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 83., inclusive, with the same force and effect as if hereafter set forth at length.
85. Defendant **DOE HARRIS** engaged in outrageous conduct towards plaintiff with the intention to cause, or with reckless disregard for the probability of causing, plaintiff to suffer severe emotional distress by sexually assaulting him as a child.
86. As a proximate result of the aforementioned assaults, batteries, and other violations committed against Plaintiff, he has suffered and continues to suffer extreme mental distress, humiliation, anguish, and emotional and physical injuries, as well as economic losses, all his damage in amounts to be proven at trial.
87. Defendant **DOE HARRIS** committed the acts alleged herein maliciously, fraudulently, and oppressively with the wrongful intention of injuring plaintiff from an improper and

evil motive amounting to malice and in conscious disregard of plaintiff's rights, entitling plaintiff to recover punitive damages in amounts to be proven at trial.

88. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.
89. This action falls within the exceptions to Article 16 of the C.P.L.R.

AND AS FOR THE EIGHTH CAUSE OF ACTION FOR ASSAULT

AS TO DOE HARRIS

90. Plaintiff repeats, reiterates and realleges each and every allegation contained in those paragraphs of this Complaint marked and designated 1. Through 89., inclusive, with the same force and effect as if herein set forth at length.
91. Defendant **DOE HARRIS'** predatory, abusive, manipulative and unlawful acts against Plaintiff, created a reasonable apprehension in Plaintiff of immediate harmful or offensive contact to plaintiff's person, all of which were done intentionally by defendant **DOE HARRIS** to plaintiff without plaintiff's consent.
92. As a direct and proximate result of the aforementioned assault, Plaintiff has sustained in the past, and will continue to sustain in the future, serious and severe psychological injuries and emotional distress, mental anguish, embarrassment and humiliation.
93. As a direct and proximate result of the aforementioned assaults, plaintiff has incurred medical expenses and other economic damages, and will now be obligated to expend sums of money for medical care and attention in effort to cure himself of his injuries and to alleviate his pain and suffering, emotional distress, mental anguish, embarrassment and humiliation.
94. By reason of the foregoing, plaintiff is entitled to compensatory damages from defendant **DOE HARRIS** in such sums a jury would find fair, just and adequate, and

the plaintiff is further entitled to punitive and exemplary damages from defendant **DOE HARRIS** in such sums as a jury would find fair, just and appropriate to deter said defendant and others from future similar misconduct.

95. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.
96. This action falls within exceptions to Article 16 of the C.P.L.R.

AND AS FOR THE NINTH CAUSE OF ACTION FOR BATTERY

AS TO DOE HARRIS

97. Plaintiff repeats, reiterates and realleges each and every allegation contained in those paragraphs of this Complaint marked and designated 1. through 96., inclusive, with the same force and effect as if herein set forth at length.
98. When plaintiff between fourteen and fifteen years old, defendant **DOE HARRIS** confined plaintiff in his bedroom, Pastor Harris' office, the barn house, and other places unlawfully sexually abused him by touching his penis, forcing him to engage in oral sex, raping him and otherwise sexually abusing him.
99. Defendant **DOE HARRIS'** unlawful, abusive, manipulative, and predatory acts against plaintiff, amounted to a series of harmful and offensive contacts to plaintiff's person all of which were done intentionally by defendant to plaintiff without plaintiff's consent.
100. As a direct and proximate result of the aforementioned batteries, Plaintiff has sustained in the past, and will continue to sustain in the future, psychological injury, pain and suffering, serious and severe psychological and emotional distress, mental anguish, embarrassment and humiliation.
101. By reason of the foregoing, plaintiff is entitled to compensatory damages from defendant **DOE HARRIS** in such sums a jury would find fair, just and adequate, and

the plaintiff is further entitled to punitive and exemplary damages from defendant **DOE HARRIS** in such sums as a jury would find fair, just and appropriate to deter said defendant and others from future similar misconduct.

102. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.
103. This action falls within exceptions to Article 16 of the C.P.L.R.

AS FOR A TENTH CAUSE OF ACTION FOR INTENTIONAL INFLICTION
OF EMOTIONAL DISTRESS AS TO JOHN DOE

104. Plaintiff repeats reiterates, and reallages each and every allegation contained in those paragraphs of the Complaint marked and designated 1. through 83., inclusive, with the same force and effect as if hereafter set forth at length.
105. Defendant **JOHN DOE** engaged in outrageous conduct towards plaintiff with the intention to cause, or with reckless disregard for the probability of causing, plaintiff to suffer severe emotional distress by sexually assaulting him as a child.
106. As a proximate result of the aforementioned assaults, batteries, and other violations committed against Plaintiff, he has suffered and continues to suffer extreme mental distress, humiliation, anguish, and emotional and physical injuries, as well as economic losses, all his damage in amounts to be proven at trial.
107. Defendant **JOHN DOE** committed the acts alleged herein maliciously, fraudulently, and oppressively with the wrongful intention of injuring plaintiff from an improper and evil motive amounting to malice and in conscious disregard of plaintiff's rights, entitling plaintiff to recover punitive damages in amounts to be proven at trial.
108. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

109. This action falls within the exceptions to Article 16 of the C.P.L.R.

AND AS FOR THE ELEVENTH CAUSE OF ACTION FOR ASSAULT

AS TO JOHN DOE

110. Plaintiff repeats, reiterates and realleges each and every allegation contained in those paragraphs of this Complaint marked and designated 1. Through 109., inclusive, with the same force and effect as if herein set forth at length.
111. Defendant **JOHN DOE'S** predatory, abusive, manipulative and unlawful acts against Plaintiff, created a reasonable apprehension in Plaintiff of immediate harmful or offensive contact to plaintiff's person, all of which were done intentionally by defendant **JOHN DOE** to plaintiff without plaintiff's consent.
112. As a direct and proximate result of the aforementioned assault, Plaintiff has sustained in the past, and will continue to sustain in the future, serious and severe psychological injuries and emotional distress, mental anguish, embarrassment and humiliation.
113. As a direct and proximate result of the aforementioned assaults, plaintiff has incurred medical expenses and other economic damages, and will now be obligated to expend sums of money for medical care and attention in effort to cure himself of his injuries and to alleviate his pain and suffering, emotional distress, mental anguish, embarrassment and humiliation.
114. By reason of the foregoing, plaintiff is entitled to compensatory damages from defendant **JOHN DOE** in such sums a jury would find fair, just and adequate, and the plaintiff is further entitled to punitive and exemplary damages from defendant **JOHN DOE** in such sums as a jury would find fair, just and appropriate to deter said defendant and others from future similar misconduct.

115. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.
116. This action falls within exceptions to Article 16 of the C.P.L.R.

AND AS FOR THE NINETH CAUSE OF ACTION FOR BATTERY

AS TO JOHN DOE

117. Plaintiff repeats, reiterates and realleges each and every allegation contained in those paragraphs of this Complaint marked and designated 1. through 96., inclusive, with the same force and effect as if herein set forth at length.
118. When plaintiff between fourteen and fifteen years old, defendant **JOHN DOE** confined plaintiff in his bedroom, Pastor Harris' office, the barn house, and other places unlawfully sexually abused him by touching his penis, forcing him to engage in oral sex, raping him and otherwise sexually abusing him.
119. Defendant **JOHN DOE** unlawful, abusive, manipulative, and predatory acts against plaintiff, amounted to a series of harmful and offensive contacts to plaintiff's person all of which were done intentionally by defendant to plaintiff without plaintiff's consent.
120. As a direct and proximate result of the aforementioned batteries, Plaintiff has sustained in the past, and will continue to sustain in the future, psychological injury, pain and suffering, serious and severe psychological and emotional distress, mental anguish, embarrassment and humiliation.
121. By reason of the foregoing, plaintiff is entitled to compensatory damages from defendant **JOHN DOE** in such sums a jury would find fair, just and adequate, and the plaintiff is further entitled to punitive and exemplary damages from defendant **JOHN DOE** in such sums as a jury would find fair, just and appropriate to deter said defendant and others from future similar misconduct.

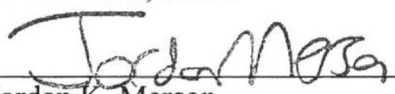
122. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

123. This action falls within exceptions to Article 16 of the C.P.L.R.

WHEREFORE, plaintiff demands judgement against defendants in such sum as a jury would find fair, adequate and just.

Dated: New York, New York
September 4, 2019

MERSON LAW, PLLC

By: 
Jordan K. Merson
Sarah R. Cantos
Attorney for Plaintiffs
150 East 58th Street 34th Floor
New York, New York 10155
(212) 603-9100

**SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS**

Index No.:

_____/19

-----X
ANONYMOUS MAN,*Plaintiff,***-against -****ATTORNEY
VERIFICATION****FREEDOM VILLAGE USA, FLETCHER BROTHERS,
DOE HARRIS and JOHN DOE,***Defendants.*-----X
JORDAN K. MERSON, an attorney duly admitted to practice in the Courts of New York State, and a member of the firm MERSON LAW, PLLC., attorneys for the plaintiffs in the within action, hereby affirms under penalty of perjury:

That he has read the within complaint and knows the contents thereof, and that the same is true to his own knowledge, except as to the matters therein stated to be alleged upon information and belief, and that as to those matters he believes it to be true.

That the sources of his information and knowledge are investigations and records in the file.

That the reason this verification is made by affirmant and not by the plaintiff is that the plaintiff is not within the County where the attorney has his office.

Dated: New York, New York
September 4, 2019


JORDAN K. MERSON

Index No.

Year 2019

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

ANONYMOUS MAN,

Plaintiff,

- against -

FREEDOM VILLAGE USA, FLETCHER BROTHERS,
DOE HARRIS and JOHN DOE,

Defendant(s),

SUMMONS AND VERIFIED COMPLAINT

Merson Law, PLLC.

Attorneys for Plaintiff(s)

Office and Post Office Address, Telephone
150 East 58th Street 34th Fl.
New York, New York 10155
(212) 603-9100

To: All Parties
